

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

In Re:	)	CHAPTER 11
	)	
George W. Park Seed Co., Inc.,	)	CASE NO. 02431-JW
	)	
Park Seed Wholesale, Inc., and	)	CASE NO. 02432-JW
	)	
Jackson & Perkins Direct	)	CASE NO. 02434-JW
Marketing,	)	
	)	
Debtors.	)	(JOINT ADMINISTRATION REQUESTED)
	)	

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**DEBTORS' MOTION FOR EMERGENCY HEARING ON THEIR MOTION  
FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTORS TO PAY  
CERTAIN PREPETITION WAGES, SALARIES AND OTHER COMPENSATION**

PLEASE TAKE NOTICE THAT the undersigned, on behalf of George W. Park Seed Co., Inc. and its Affiliates ("Park" or the "Debtors"), the above captioned debtors-in-possession, hereby move before this Court for its proper order granting an emergency hearing on their Motion for Entry of an Order Authorizing the Debtors to Pay Certain Prepetition Wages, Salaries and other Compensation ("Motion"), which is being filed contemporaneously herewith. The required memorandum is incorporated herein. In support of this request for an emergency hearing and pursuant to SC LBR 9013-1(d), the Debtors state as follows:

Pursuant to the Motion, Park seeks authority to pay in their sole discretion certain employee related pre-petition claims ("Employee Obligations", as defined in the Motion) and an order authorizing banks and other financial institutions to receive, process, honor and pay all checks and electronic payments related to the Employee Obligations. Many of

the Debtors' Employees rely exclusively on the Employee Obligations to satisfy their daily living expenses, and consequently may suffer significant financial difficulties if the Debtors are not permitted to honor obligations for unpaid compensation. Additionally, the Debtors' Employees are integral to its operations, and failure to satisfy its Employee Obligations will jeopardize Employee loyalty and trust, possibly causing Employees to leave the Debtors' employ and severely disrupting the Debtors' operations at a critical juncture. Thus, the Debtors respectfully request that this matter be heard at the earliest possible time.

WHEREFORE, the Debtors request the Court to enter its order granting its request for an emergency hearing on its Motion.

Respectfully Submitted,

/s/ R. Geoffrey Levy  
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